



# **2020 RACT SIP Analysis**

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**Compliance and Permitting Manager**

**PCAPCD Board Meeting**  
**June 11, 2020**

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## **REQUIREMENTS**

- Region classified as non-attainment for the 2015 Federal ozone standard (0.070 ppmv)
  - Clean Air Act requires District rules reflect Reasonable Available Control Technology (RACT) for volatile organic compounds and nitrogen oxides
  - That rules be included in an EPA-approved State Implementation Plan (SIP)
- RACT SIP update due August 2020
  - Previous RACT SIP updates – 2006, 2008, 2011, 2014
- EPA review and approval

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## DEMONSTRATION COMPONENTS

- District rules must:
  - Meet EPA "Control Technique Guidelines" (CTGs)
  - Consider similar rules of regional Districts
  - Address all "major" sources of NOx and VOC
- "Negative declaration"
  - Confirm that District does not have operating sources in CTG categories where we do not have a rule

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## RESULTS

No new rules required, current District VOC/NOx prohibitory rules meet RACT

Rule Title	Rule Title
212 Storage of Organic Liquids	234 Automotive Refinishing
213 Gasoline Service Stations, Tank Transfer	235 Adhesives
214 Gasoline Service Stations, Vehicle Refueling	236 Wood Products Coating Operations
215 Gasoline Bulk Plants and Terminals	238 Flatwood Paneling
217 Cutback Asphalt	239 Graphic Arts
218 Architectural Coatings	240 Surface Preparation and Cleanup
223 Metal Container Coating	243 Polyester Resin Operations
229 Fiberboard Manufacturing	244 Semiconductor Operations
231 Boilers, Steam Generators, Process Heaters	245 Surface Coating of Metal Parts and Products
233 Biomass Boilers	249 Plastic Parts Coating
	250 Gas Turbines

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## RESULTS

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- Rule 216, Organic Solvent Cleaning and Degreasing, requires amendment
  - Removal of exemption.
    - No District sources rely on this exemption
  - Commitment to make rule amendment in coming year

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## RESULTS

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Negative declarations for CTG categories for which the District does not have any applicable sources

Aerospace Coatings	Oil and Natural Gas
Automobile and Light-duty Truck	Paper and Fabric
Assembly Coatings	Paper, Film, and Foil Coating
Dry Cleaners (Petroleum)	Pharmaceutical Products
Fiberglass Boat Manufacturing	Polyester Resins Manufacturing
Flexible Package Printing	Refineries
Large Appliances Surface Coating	Rubber Tires
Magnet Wire	Ships/Marine Coating
Metal Furniture Coatings	Synthetic Organic Chemicals
Natural Gas/Gasoline Processing	Wood Furniture Manufacturing

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## **ACTION REQUESTED**

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- Adopt Resolution #20-04 approving the 2020 RACT SIP Analysis, District Staff Report, dated May 2020 and associated Negative Declaration for CTG source categories without applicable District sources and no major sources of VOCs